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# Integrity Matters

Our Code of Conduct



Effective July 12, 2026

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# A MESSAGE FROM CEO, DUNCAN MACNAUGHTON

At Family Dollar, integrity, respect, and accountability are the foundation of everything we do. As a trusted leader in retail, the way we conduct ourselves in every interaction — with customers, partners, and communities — truly matters.

Our Code of Conduct is more than a set of rules—it's a commitment to help us do the right thing, speak up when something doesn't feel right, and ensure that we treat others with fairness and dignity. Whether you're working in our stores, warehouses, offices, or remotely, I ask that you read this Code carefully and apply it in your daily work. If you're unsure about what to do, ask for guidance. You'll be supported for doing the right thing.

Our reputation is built not only on the quality of our products and services, but on the assets we uphold and the choices we make.

The most important and best **ASSET** is you! And when you embrace and demonstrate these qualities, we will enjoy success together.

**ACCOUNTABLE** – If we say we're going to do it, we do it. If something goes wrong, we own it and fix it.

**SIMPLE** – We keep things clear and easy without overcomplicating. If there's a cleaner way to get it done, go for it.

**SPEEDY** – We move with urgency. We act quickly to keep things moving, without losing focus or cutting corners.

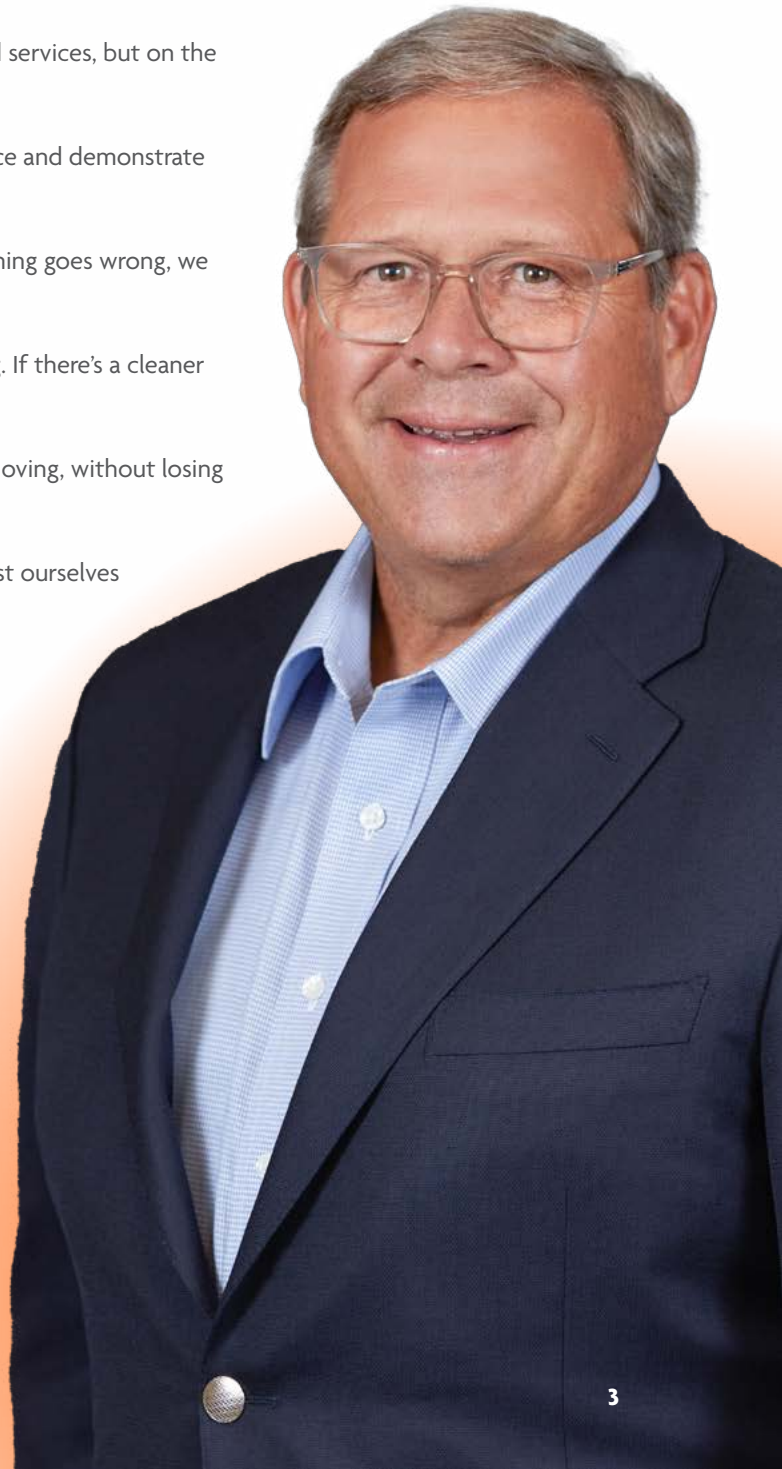
**EMPOWERED** – We make smart decisions and take action. We trust ourselves to figure things out and learn as we go.

**TRANSPARENT** – We're honest and keep people in the loop. We share what we know and speak up so we all stay on the same page.

Each of us plays a vital role in upholding our culture and reinforcing the trust that customers, teammates, and communities place in Family Dollar. Thank you for committing to the high standards that make Family Dollar a place we can all be proud of.

## DUNCAN MACNAUGHTON

Chief Executive Officer



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# Our Values

## ACCOUNTABLE

If we say we're going to do it, we do it. If something goes wrong, we own it and fix it.

## SIMPLE

We keep things clear and easy without overcomplicating. If there's a cleaner way to get it done, go for it.

## SPEEDY

We move with urgency. We act quickly to keep things moving, without losing focus or cutting corners.

## EMPOWERED

We make smart decisions and take action. We trust ourselves to figure things out and learn as we go.

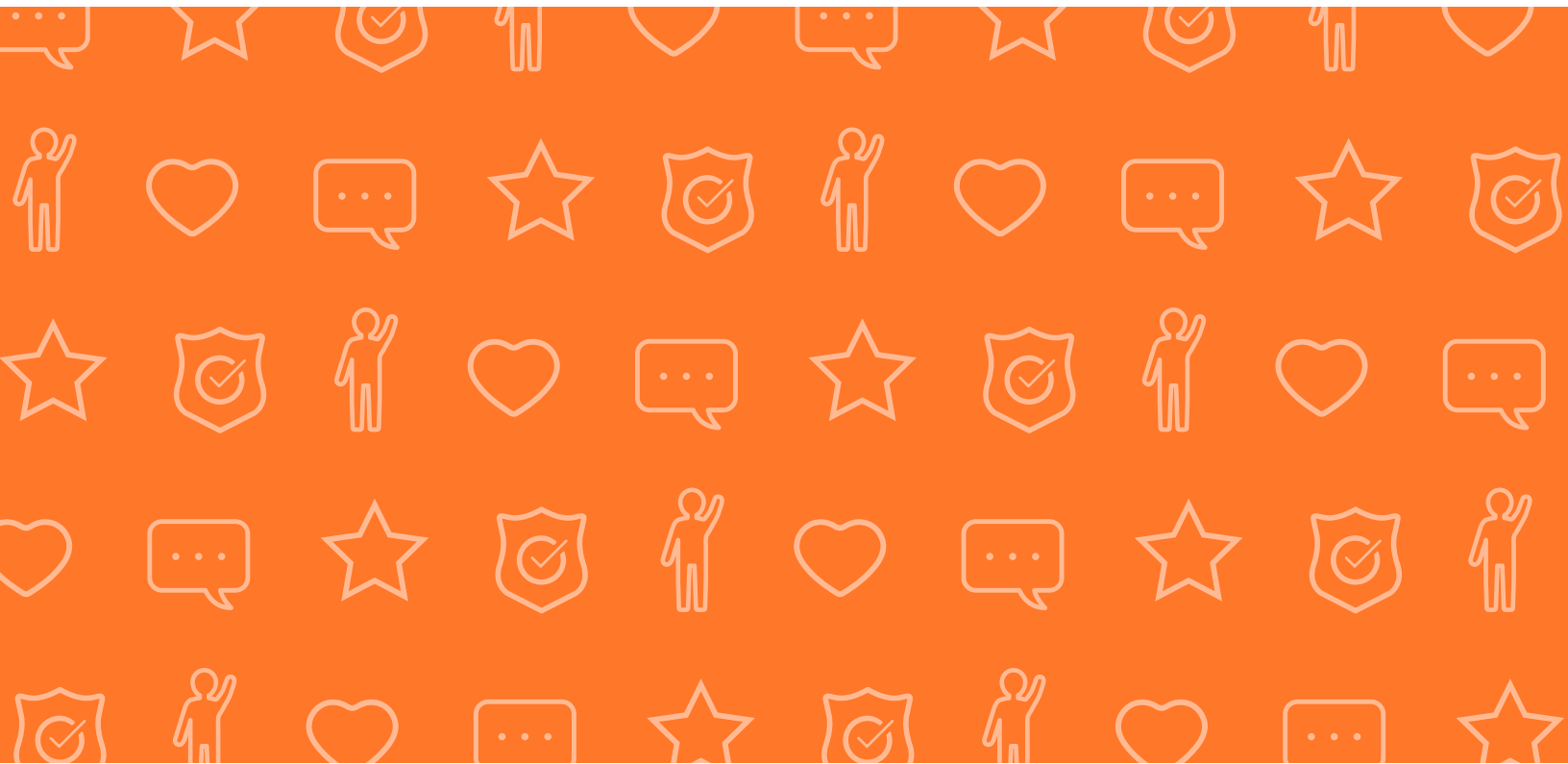
## TRANSPARENT

We're honest and keep people in the loop. We share what we know and speak up so we all stay on the same page.



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# Our Code of Conduct



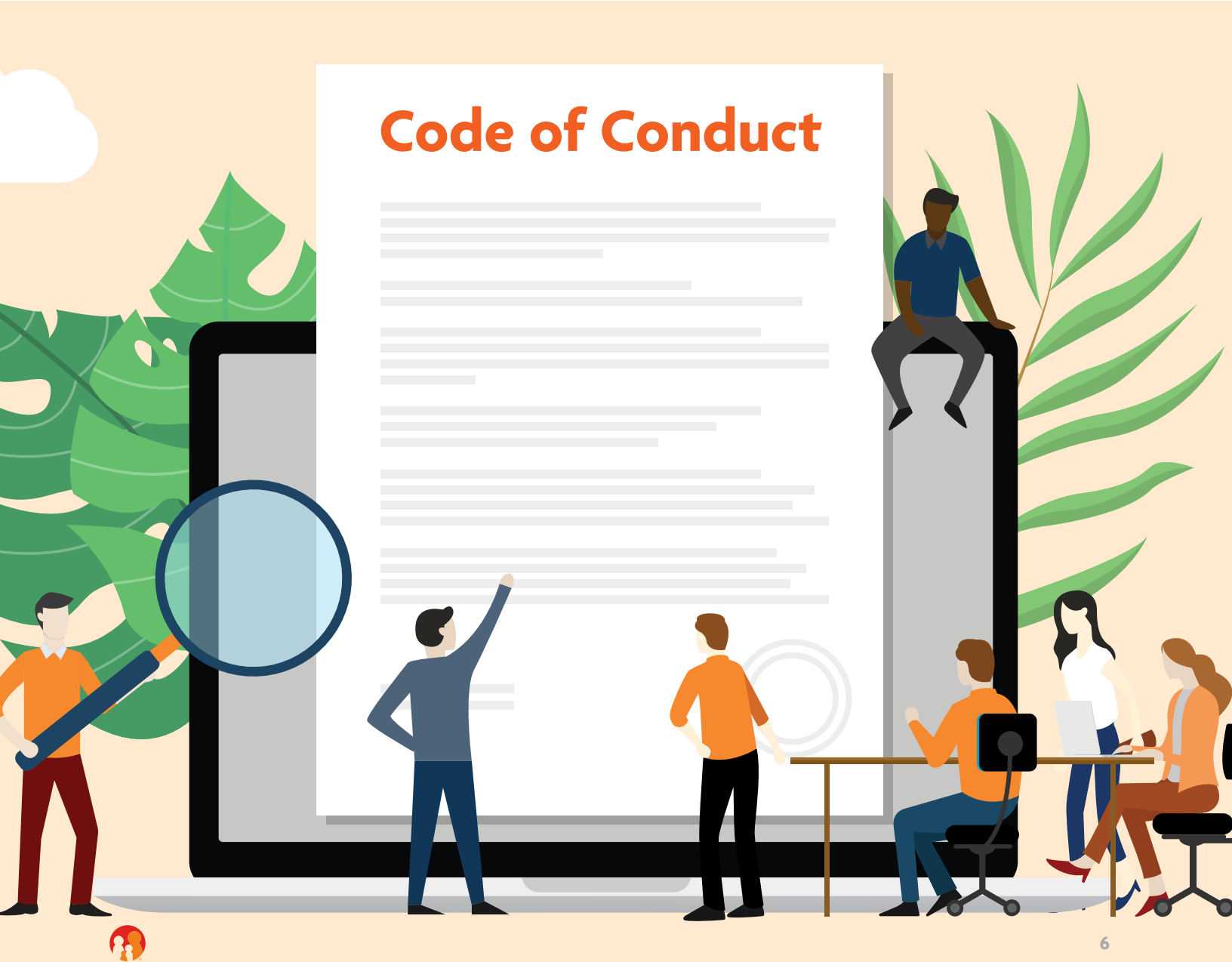
# OUR CODE OF CONDUCT

## Purpose of Our Code

Our Code of Conduct (the “Code”) guides associates of Family Dollar (the “Company”) in making ethical and lawful choices as we run our stores and business and serve our customers every day. Our Code is guided by our values, sets out our expectations and obligations, and offers resources to help you navigate difficult situations. In some places, the Code summarizes key legal requirements that govern our business practices. Without exception, we are committed to complying with all applicable laws and regulations. Beyond highlighting key policies and laws, the Code reflects who we are, how we operate, and what is important to us as a company.

No Code can capture every challenging question or scenario that could arise. When there’s not a clear answer, ask yourself what action is consistent with the language and spirit of our Code and Company values. When in doubt, reach out to [Ethics and Compliance](#), [Integrity Matters](#), Legal, Human Resources, or your manager. If you are unsure, just ask.

We update the Code periodically based on evolving business needs and regulatory requirements. Refer to it regularly, and let it guide you always to do the right thing to honor our Company’s commitment to integrity.



## Who is Covered by Our Code

Our Code applies to all Company officers, board members, associates and subsidiaries of Family Dollar anywhere in the world. In addition, we expect our vendors, suppliers, contractors, representatives, and other third parties that provide goods or services to the Company to act ethically and in a manner consistent with our Code. A separate Code of Vendor Conduct details additional ethical and business conduct expectations of our vendors.

In rare circumstances, it might be appropriate for the Company to waive part of the Code. To request a waiver, contact Ethics and Compliance in advance of the activity for which you are seeking a waiver.

## When and How to Report Concerns

Anyone who is aware of or suspects a violation of our Code, our policies, or the law must promptly report it to Integrity Matters, Ethics and Compliance, Legal, or Human Resources. Reports may be made confidentially, and where permitted by law, anonymously. All reports are treated as confidentially as possible.

We support associates who make honest, good-faith reports of a suspected violation. Good faith means that you sincerely believe that misconduct has occurred or is occurring, and that you do your best to be truthful and accurate whenever you make a report. We do not tolerate any form of retaliation for reports or complaints about misconduct that were made in good faith. Retaliation itself is a breach of our Code and cause for disciplinary action, up to and including termination. If you feel that you have been retaliated against for reporting a concern, contact Ethics and Compliance, Integrity Matters, Legal, or Human Resources.

Failing to report potential wrongdoing (or knowingly reporting false information) is a breach of our Code and may be cause for disciplinary action, up to and including termination.

Nothing in this Code or our policies limits you from communicating with and providing information to any governmental agency or commission, including among others, the Equal Employment Opportunity Commission, regarding possible legal violations. You are not required to disclose such communications to the Company, consistent with applicable whistleblower legal protections. The Company prohibits retaliation against you for any of these activities.

## Investigation of Suspected Violations

We review and investigate, as appropriate, any suspected violations of our Code. All associates are expected to cooperate and provide complete and truthful information in connection with any investigation. The Company shares investigative information only on a need-to-know basis or as required by law. If an investigation reveals that an associate acted inconsistently with our Code, policies, or the law, the associate will be subject to disciplinary measures — up to and including termination, as well as potential legal action.



### WAYS TO REPORT TO INTEGRITY MATTERS OR ETHICS AND COMPLIANCE

**Below are some resources that associates can use to report potential violations of our Code or to seek guidance:**



#### **Integrity Matters Hotline**

In the US call 1-833-777-7587;  
in China call 400-120-1892



#### **Integrity Matters Email**

[FDIntegrityMatters@familydollar.com](mailto:FDIntegrityMatters@familydollar.com)



#### **Integrity Matters Website**

[IntegrityMattersFamilyDollar.Ethicspoint.com](http://IntegrityMattersFamilyDollar.Ethicspoint.com)



#### **Ethics and Compliance**

[FDEthicsAndCompliance@familydollar.com](mailto:FDEthicsAndCompliance@familydollar.com)



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# Integrity Matters



# INTEGRITY MATTERS

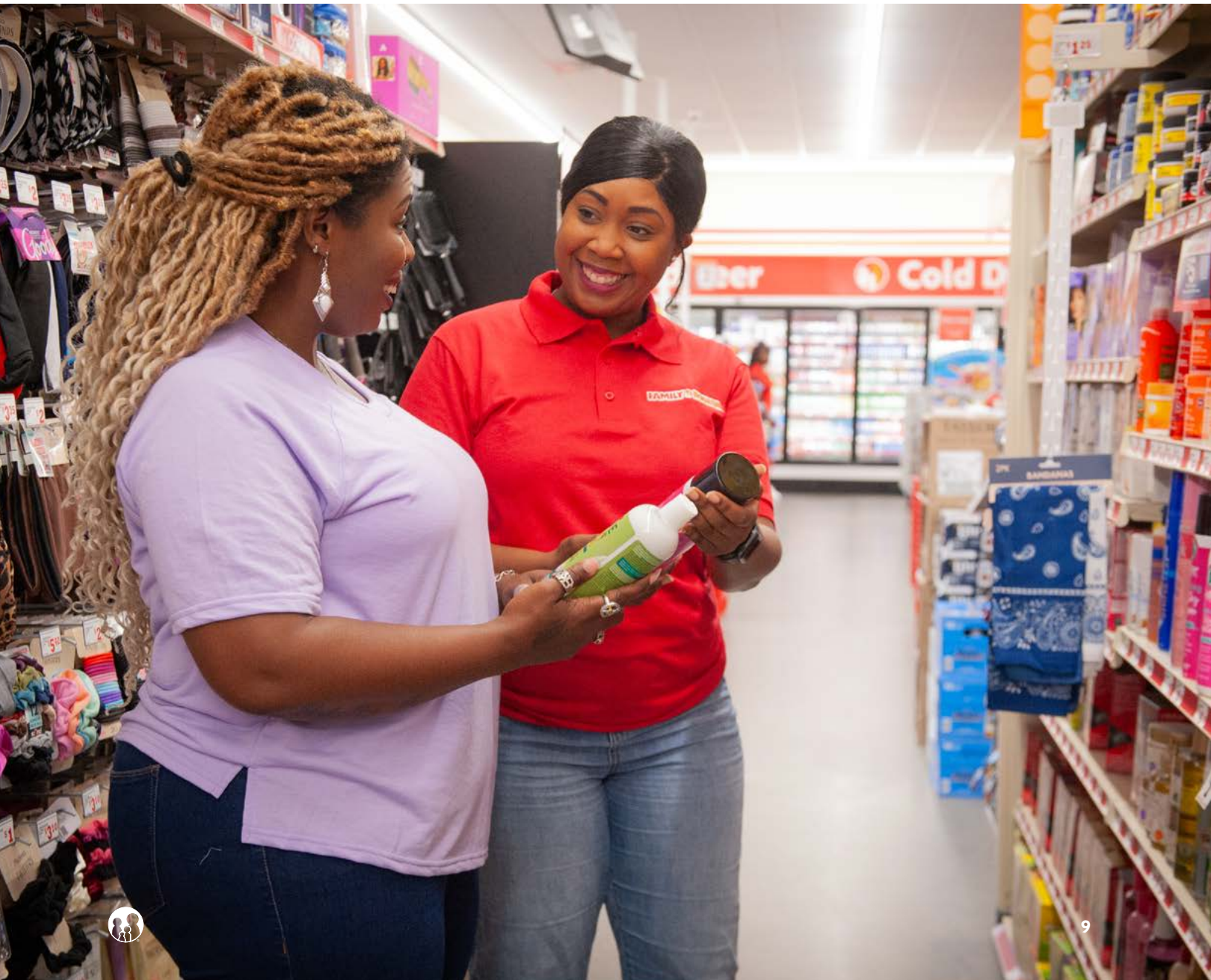
## Act with Integrity

Our business thrives when our customers, fellow associates, and communities trust us, so we must perform our work with the highest degree of honesty and integrity. Honesty and integrity build trust. We must uphold the Company's values in all our dealings with customers, other associates, communities, vendors and business partners, and all other stakeholders.

## Expect More from Our Leaders

Leaders have a special responsibility not just to live our values and comply with our Code, our policies, and the law but also to foster a culture of integrity among those they lead. We expect leaders to set clear expectations around our values and compliance, and maintain open lines of communication with those they supervise so their teams feel confident and comfortable coming to them with concerns and to take those concerns seriously when raised.

Leaders must elevate reports of violations of our Code, Company policies, or the law to Ethics and Compliance, Integrity Matters, Legal, or Human Resources. Always treating those they supervise fairly and consistently is critical to building trust and mutual respect.



## Recognize and Avoid Conflicts of Interest

We all share an obligation to act in the Company's best interests by avoiding actions or situations that make it difficult for us to perform our work objectively and effectively. That means when we are presented with opportunities for personal gain at the Company's or a vendor's expense, we must say no.

A conflict of interest occurs when personal interests interfere with, or may appear to interfere with, our work at the Company. To foster a culture of trust, integrity, and fair dealing with our customers, vendors, communities, and fellow associates, we must avoid personal interests that look or feel unfair or unethical.

Situations involving a conflict of interest may not always be obvious or easy to resolve. You should report situations that may involve a conflict of interest to your Human Resources partner, Ethics and Compliance, or Integrity Matters. They will help you to take steps to avoid or resolve a conflict.

Although it would be impossible to describe every possible scenario, it's important to know and avoid the common situations that could create a conflict or a perception of a conflict. Outside employment and business interests, financial investments, kickbacks, gifts, entertainment, and personal or vendor relationships are areas where conflicts often arise.

### Outside Employment and Business Interests

We do not allow outside employment or business interests to interfere with our work at the Company. The following are examples of situations that constitute prohibited outside employment and business interests:

- Working for a competitor or vendor while employed by Family Dollar as a management associate or salaried associate. This includes employees serving on the board of directors or advisory board of competitors or vendors.
- Competing with Family Dollar for property, products, services, or other interests, or taking business opportunities for yourself that you discover or generate through your work at the Company.
- Providing consulting services to a third party in return for compensation or other benefits.
- Doing business on behalf of Family Dollar with a company in which you have a personal or financial interest.
- Directing business to a vendor owned or managed by, or which employs, a family member.
- Leveraging a position of authority within Family Dollar for personal gain, including through interactions with vendors or associates.



## Financial Investments

Associates are not permitted to: i) own a material investment in a Family Dollar vendor if they can influence the Company's relationship with that vendor or ii) purchase a material investment in a competitor. These prohibitions do not apply to investments in mutual or similar funds, or to investments held in discretionary or managed accounts over which the associate has no control of the investment decisions.

## Kickbacks, Gifts, and Entertainment

When we decide to work with a vendor, we make business decisions based on price, quality, service, and suitability to the Company's needs, not the receipt of personal benefits. To that end, neither we nor our families can accept, directly or indirectly, personal kickbacks, payments, or benefits that are related in any way to the Company's purchasing and procurement decisions and activities.

All associates must be careful to avoid circumstances that could cast doubt on the objectivity of the business decisions we make.

Accepting something of value from a vendor can lead to such doubts and can increase our costs. As a result, our rule is that associates and their family members cannot accept from a vendor any gift or token of more than nominal value, or any prize, trip, benefit, cash or monetary payment, or other favor.

There are a few circumstances in which associates are permitted to receive something of nominal value in the normal course of business:

- Associates may allow vendors to pay for reasonable meals offered during the normal course of a business meeting with such vendors.
- Associates may attend a vendor-sponsored conference so long as the vendor has not paid for or subsidized the associates' transportation, accommodations, or entertainment during the conference.
- Associates may attend trade association conferences subsidized by the trade association, so long as attendance is approved in advance in writing by the senior leader of the associates' department.
- Associates may attend Company-sponsored trade shows and events and receive items of nominal value and promotional items from participating vendors.

If you receive a gift that is not in compliance with this Code, you must return it to the giver with an explanation that such gifts are contrary to our Code. The Company will pay the expense of returning the gift. Gifts that are impractical to return should be reported to a supervising Vice President or above for disposition, which may include, in the case of perishables or food, sharing such items with other associates in common work areas.

Inappropriate gifts or benefits can take many forms, and the lines may not always be clear. When in doubt, refer to the Company's Gifts and Entertainment Policy, contact Ethics and Compliance for advice on how to handle a specific situation, or ask a question through Integrity Matters.



### EXAMPLE



**"I work in Human Resources, and my daughter received a birthday gift from a family friend who is a Family Dollar vendor. Can she keep this gift?"**



Yes. Your Human Resources job does not involve influence over the Company's business with this vendor, so no conflict or perceived conflict of interest is present. If your position does involve such influence, contact Ethics and Compliance for guidance or ask a question through Integrity Matters.



## Associate Relationships

To ensure that our work is done properly and that associates are treated fairly and equally, we maintain rules around associate relationships in the workplace. It is against Company policy to hire or directly or indirectly supervise a family or household member, or to influence a family or household member's conditions of employment at the Company. Family or household members include spouses, domestic partners, parents, children, siblings, grandparents, grandchildren, nieces, nephews, uncles, and aunts — whether related by blood, marriage, or adoption — as well as anyone living in an associate's household. While an associate's family members can work for the Company, it is important that there are degrees of separation to prevent both the reality and perception of unfairness.

Romantic relationships are prohibited between associates within the same line of supervision, or who otherwise hold influence over one another's performance or opportunities for promotion. A romantic partner is someone an associate is dating or with whom an associate has a sexual relationship. Associates should notify HR if such a relationship predates a change in organizational structure that places one romantic partner under the authority of the other.

## Vendor Relationships

To ensure that our procurement processes are effective, fair, and in the Company's best interests, you must disclose to Ethics and Compliance when you have a close personal relationship with a vendor or potential vendor and can influence the Company's relationship with that vendor. In those situations, work with Ethics and Compliance to appropriately avoid or manage any potential conflicts of interest.



## EXAMPLES



**“A friend of mine owns a business and asked if I would be interested in doing some work for his company outside of my hours with Family Dollar. Is this okay?”**



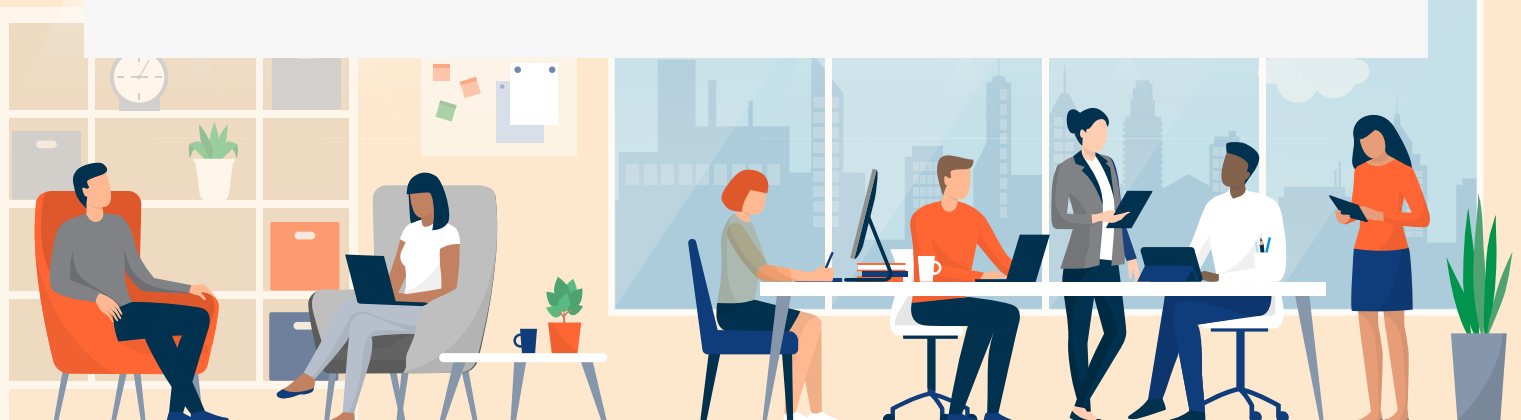
It depends. If the work involves competing with the business of Family Dollar or otherwise interferes with your capacity to act in the Company's best interests (e.g., your friend's business is a Company vendor in your area of responsibility), you must decline it as it presents a conflict of interest. If, on the other hand, the work is totally unrelated to your work at Family Dollar, it may be okay. Request guidance from HR or Ethics and Compliance or ask a question through Integrity Matters before accepting the job.



**“I work in Procurement or Merchandising, and I am a member of the same local social club as a Family Dollar vendor. The organization has many events throughout the year. Is it a conflict for me to attend?”**



No, it is not a conflict for you to attend. You can participate in the club's events, but be aware of how those around you may perceive your social interactions if you hold a position of influence over Family Dollar's business with this vendor.



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# Integrity for Our Associates



## INTEGRITY FOR OUR ASSOCIATES

We are committed to providing a safe working environment for associates, complying with all OSHA standards, and other state and local health and safety rules. Associates should identify, and where possible, immediately correct any unsafe work situations. We can protect ourselves and fellow associates by performing only jobs in which we are trained for, using appropriate protective gear and following safety procedures and warnings. If you feel unsafe in your workplace, report unsafe conditions (including accidents or near-misses) to your manager, the Environmental, Health and Safety team, or Integrity Matters.

We do not tolerate physical violence, verbal threats, verbal abuse, or other intimidating or threatening behavior, either from associates or customers. We also do not allow associates to possess weapons in the workplace. Threats of violence, actual violence, or suspected dangerous behavior must be immediately reported to your Manager, Human Resources, or Integrity Matters. If you have an imminent fear for your safety or the safety of others, or are in any other emergency situation, do not wait — call 911 in the U.S., or the local emergency service number if you are in another country.

To protect each other as well as our customers, we do not allow associates to use or be under the influence of alcohol, marijuana, or illegal drugs while working — nor do we tolerate the possession or distribution of illicit substances at or near the workplace. Keeping your judgment and faculties unimpaired is vital to working in a safe and effective way.



### S.P.E.E.D

We use the acronym S.P.E.E.D. to highlight 5 key safety rules that stores must maintain at all times. Ensuring stores are S.P.E.E.D. compliant will help keep associates and customers safe. S.P.E.E.D. stands for:

#### **S**tacking height no higher than 8 feet and stable.

- Keep stacks stable and less than 8 feet.
- Always put heavier/larger items on the bottom of a stack and lighter ones on top.

#### **P**athway clear to all exit doors.

- ALWAYS keep a clear path to all exits, including those only for associate use, in case of an emergency.
- Pathways must be at least 36-in.

#### **E**xtinguishers unblocked.

- Fire extinguishers must be unblocked and accessible at all times.
- Never place boxes or other items in front of fire extinguishers in a manner that could block access in case of emergency.

#### **E**lectrical panels unblocked.

- Electrical panels must also remain unblocked at all times, with at least 36-in. clearance in front of the panels.
- Pay attention to any colored warning lines and ALWAYS keep these areas empty.

#### **D**oors unblocked, unlocked, and clear.

- Make sure ALL exit doors remain unblocked, unlocked, and clear at all times.
- Ensure there are no objects (merchandise, carts, displays, etc.) that prevent access to any exit door.

Store teams are expected to maintain compliance with S.P.E.E.D. at all times. If S.P.E.E.D. cannot be maintained, stores should contact their District Manager, Regional Director, Environmental, Health and Safety, or Integrity Matters.





## EXAMPLE



**“The door leading from the backroom to the parking lot is broken and won’t stay closed. The manager has put a padlock on the door to keep it shut. It doesn’t feel safe, but my manager said not to worry about it. What should I do?”**



Padlocking an emergency exit is a fire hazard and violates our S.P.E.E.D. program. It is not okay to ignore a safety hazard even on your manager’s instruction. Reach out to the Environmental, Health and Safety team or Integrity Matters about this concern and similar concerns.



## Pay for Hours Worked

We are committed to complying with all applicable state, local, federal, and national wage and hour laws, and paying associates for all time worked. This means that hourly associates must not do any work off the clock. Working off the clock includes working before clocking in, working after clocking out, or working during unpaid meal breaks.

Managers must ensure that hourly associates have time for meal periods and rest breaks, and properly account for all time worked. Hourly associates should record only their own time and never a coworker's time. Time must be submitted accurately and completely.



### EXAMPLE



**“My manager asked me to break down boxes for recycling after my shift. It won’t take very long, but I’m supposed to be heading home. Is that okay?”**



No. Tell your manager that you are already off the clock for the day and should not violate Company policy by working after your shift. You must either clock back in or refrain from doing the work. If your manager insists or otherwise makes you feel pressured to work without clocking back in, reach out to your Human Resource partner or Integrity Matters.



## Inspire Belonging

The Company is committed to fostering an inclusive environment where individual differences are respected and appreciated. We recognize that diversity of thought and experience is a strength, and we strive to inspire belonging by treating all associates fairly, with dignity and respect.

We do not tolerate discrimination, whether on the basis of race, national origin, ancestry, nationality, color, religion, sex, pregnancy, age, marital status, domestic partnership status, civil union status, actual or perceived disability, sexual orientation, gender identity or expression, military status, atypical hereditary cellular or blood trait, genetic information, refusal to submit to genetic tests, refusal to make available results of genetic tests, or any other legally protected status.

We will make reasonable accommodations, consistent with the law, for associates with disabilities. If you have any questions about our accommodations request process, reach out to your HR partner.



## A Workplace Free from Harassment

The Company strives to provide a positive workplace free from harassment, bullying, intimidation, and other unprofessional and unproductive workplace conduct. We do not tolerate inappropriate or offensive behavior in the workplace, including sexual comments, jokes, or advances, or remarks or actions based on race, color, religion, national origin, gender, sexual orientation, gender identity, age, disability, or marital status.

We encourage associates to come forward if you believe you have been subjected to any inappropriate or offensive behavior. We also encourage you to stand up for other associates who may have been subjected to such behavior by reporting the behavior to your manager, Human Resources partner, or Integrity Matters. We are all responsible for creating a safe, comfortable, and respectful work environment.



### EXAMPLES



**“At a team meeting, one associate started telling jokes about the ethnic group of another associate, who looked uncomfortable but didn’t say anything. Since I wasn’t the target of this offensive humor, should I just let it go?”**



No, you shouldn’t. Every associate is responsible for creating a comfortable, inclusive, and respectful work environment. Let your manager know that the associate’s humor was inappropriate. If the manager is regularly permitting or encouraging this type of behavior, reach out to your Human Resources partner or Integrity Matters.



**“Although aggressive romantic advances from one of my managers are making me very uncomfortable, I’m afraid to report the behavior in case I end up being punished for speaking up. What should I do?”**



You should report the concern to a more senior member of management, your Human Resources partner, or Integrity Matters so we can address the issue. If, after you report the conduct, you believe that your manager or others involved in your supervision are retaliating against you, report the retaliatory conduct to Integrity Matters. We do not tolerate retaliation against someone for speaking up in good faith.



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# Integrity for Our Customers and Vendors



# INTEGRITY FOR OUR CUSTOMERS AND VENDORS

## Selling Safe Products

Our customers and communities count on us for safe, high-quality, and affordable products. Such products are at the core of our business. For us to earn and maintain customer trust, our products (including food, drugs, cosmetics, and general merchandise) must comply with not only the applicable legal and regulatory requirements for product quality and safety — including proper manufacturing, labeling, warehousing, and distribution — but also our own internal standards.

For example, products must be stored in clean and sanitary conditions and be free of pests and other potential contaminants. We cannot sell food or drugs that are past their expiration dates, have opened packaging, or are otherwise damaged or tainted, and we must promptly and appropriately address customer concerns related to product safety and labeling and quickly respond to product removals and recalls.

To deliver on our customer promise, we all share a responsibility for following product safety laws, including the U.S. Consumer Product Safety Act and the U.S. Food, Drug, and Cosmetics Act (or market-equivalent laws), as well as our internal standards. Learn, understand, and follow the product and food safety requirements and procedures that are relevant to your role. If you become aware of a safety issue with an item, report it in accordance with the applicable procedure or contact Ethics and Compliance or Integrity Matters

In the event of a product recall, it is the supplier's responsibility to reach out immediately to the following Family Dollar email distribution list, [FDrecalls@familydollar.com](mailto:FDrecalls@familydollar.com).



### EXAMPLES



**“While unloading a truck at the store, I noticed several boxes of product that appeared to be pest damaged. This is a best-selling product, and we do not have any of it on our shelves. Would it be okay to put the product on the shelf?”**



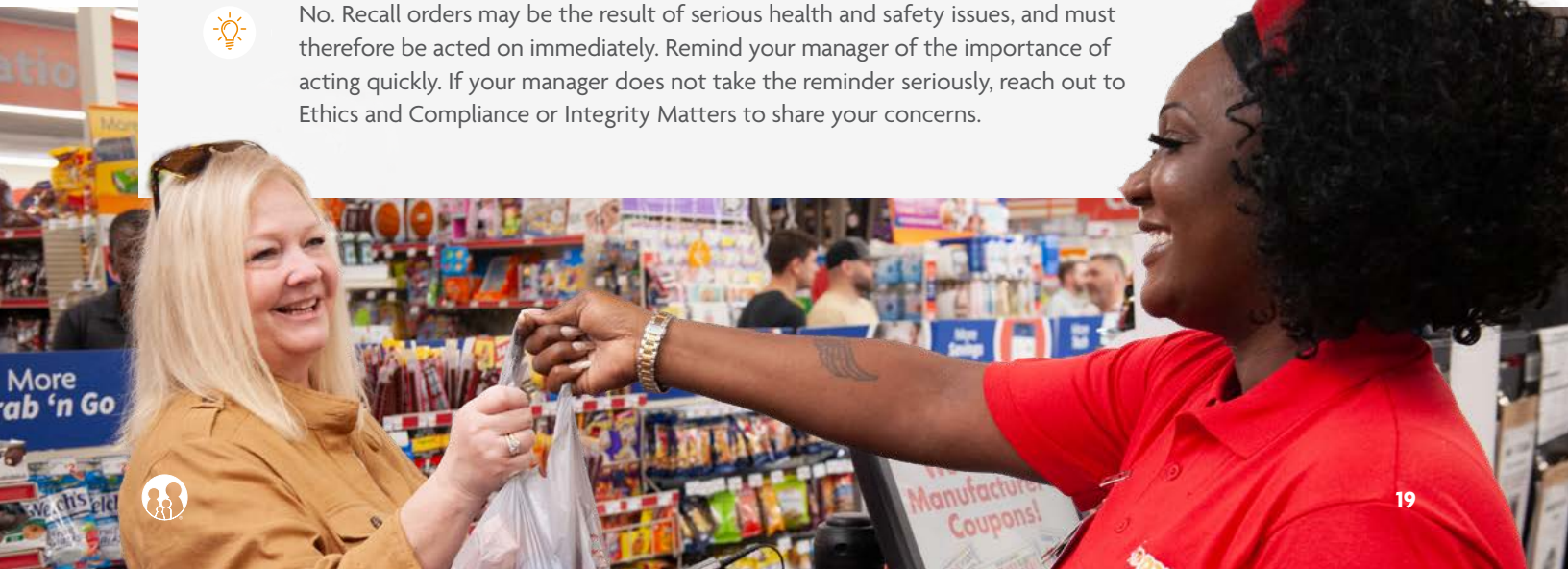
No, this is a food or product safety hazard. Report the pest-damaged product in accordance with the applicable procedure or contact Ethics and Compliance or Integrity Matters.



**“An OpsCenter task came in today requiring us to remove a product from the sales area immediately. The store manager said that because we're understaffed today, we don't have time to do the removal. She said that tomorrow will be soon enough. Is it okay to wait?”**



No. Recall orders may be the result of serious health and safety issues, and must therefore be acted on immediately. Remind your manager of the importance of acting quickly. If your manager does not take the reminder seriously, reach out to Ethics and Compliance or Integrity Matters to share your concerns.



## Our Vendors Must Adhere to Our Values and Code

As our business continues to grow, we remain committed to our core values and, through a careful selection process, will establish and maintain relationships with vendors that share our values and meet or exceed our expectations. We have high internal standards and expect the same of our vendors.

We expect vendors to act in a manner consistent with our Code. Our vendors must also comply with our Vendor Code of Conduct, their contractual commitments, and applicable laws and regulations. Our vendors must supply and provide products and services that meet all applicable legal, industry, and Company standards — including those relating to safety, product stewardship, worker and labor rights, and the environment. Trade vendors that import to the United States must comply with the applicable import requirements and the export requirements of the countries in which they operate.

## Transparent and Accurate Pricing

Pricing accuracy is critical to maintaining the trust of our customers. As a leading value retailer, Family Dollar must clearly and accurately communicate its prices to customers and ensure that prices on shelves match the prices at the register. If a customer brings a product to the register and it rings up with a higher price than what is labeled or advertised in the store, our policy is to honor that lower price on behalf of the customer.

## Respect Human Rights

Our Company provides fair working conditions and expects our vendors to do the same. We do not tolerate child labor, forced labor, prison labor, human trafficking, or slavery in our supply chain, and we expect every link in our supply chain to share our dedication to conducting business in a legal and ethical manner. Our vendors must share our commitments to keeping accurate and honest records, providing safe, healthy, and sanitary working conditions across all their operations, fostering an inclusive work environment that is free of harassment and discrimination, as well as compensating workers for all working hours in accordance with the laws of the countries in which they do business.

Do your part to hold our vendors to our business conduct standards and requirements. If you suspect that a vendor is not acting in a manner consistent with our values and Code or is not complying with the law or our Vendor Code of Conduct, contact Legal, Ethics and Compliance, or Integrity Matters.



# Integrity in Our Business



# INTEGRITY IN OUR BUSINESS

## Never Engage in Bribery

Our rule about bribery is simple: we do not offer, promise, pay, request, or accept bribes, kickbacks, or other illicit payments in any form — or of any value, to or from any person. We do not engage in any form of corruption to gain business or any other favorable action, no matter where we are doing business. We also never allow or ask a third party to do so on our behalf.

Keep in mind that bribes are not limited to cash; they can be anything of value, including access to any kind of benefit, privilege, discount, travel, meals, entertainment, political donation, offer of employment, or charitable contribution. It is especially important to avoid any real or perceived impropriety when interacting with government officials, including associates of government-owned or controlled entities. No gifts or business entertainment of any kind may be given to any government official or employee without prior approval from Legal or Ethics and Compliance. No vendors who are expected to interact with government officials or employees on the Company’s behalf may be engaged without the prior approval of Legal or Ethics and Compliance.

Because these lines can be highly sensitive and hard to draw when doing business in another country, especially countries with substantial government involvement in business, contact Legal, Ethics and Compliance, or Integrity Matters if you have any questions or concerns about how the Company or a vendor is operating.

Associates or vendors that engage in improper transactions expose themselves not only to disciplinary measures by the Company but also to potential civil and criminal liability. Even when the norms and laws of other countries differ, associates and vendors must adhere to our Code and policies.



### EXAMPLE



**“Government authorities are delaying the processing of our merchandise through customs in a country outside the United States. One official says that the merchandise will be released only if Family Dollar pays a \$100 “processing fee.” My local contacts say this is just how business is done in this country. Should we go ahead and pay this amount?”**



No. We do not allow any improper payments to influence government officials, including customs authorities. This rule applies to both cash payments and other items of value. Report this request immediately to Legal, Ethics and Compliance, or Integrity Matters.





## Compete Fairly

We are committed to competing fairly and complying fully with all applicable antitrust and competition laws. To these ends, we do not and cannot form agreements with competitors on sensitive matters such as price, costs and margins, business strategy, terms of sale to customers, bid submissions, market allocations, or hiring and compensation. We also do not and cannot, whether directly or indirectly, share non-public and competitively sensitive information on these topics with our competitors.

Additionally, we do not engage in deceptive advertising or sales practices. We must always give our customers clear and accurate information about merchandise, services, and pricing.

Antitrust and competition laws can be complex. Contact Legal or Ethics and Compliance, or reach out through Integrity Matters, if you have any questions or uncertainties about whether or how antitrust or competition laws might apply to a situation.



### EXAMPLE



**“At a trade conference, an executive from one of our competitors approached me and started to talk about the general state of the economy. The executive said that her company planned to maintain their current prices for the next six months. She then asked how we were planning to address current economic conditions. Is this okay?”**



No. The exchange of competitively sensitive information with competitors, including non-public, future pricing plans, is not permitted. In this scenario, a government regulator may interpret the exchange of future pricing plans between competitors to be a means of facilitating an agreement to fix prices. Agreements to fix prices with competitors are illegal and can result in criminal liability, jail time, and heavy fines. Report this matter immediately to Legal or Ethics and Compliance.





## **Prevent Money Laundering and Consumer Fraud**

We are committed to complying with all anti-money laundering and anti-terrorism laws and regulations, in addition to preventing our products, services, and properties from being used in support of criminal activity, terrorism, or consumer fraud.

Associates should keep an eye out for transactions that seem suspicious, especially transactions involving pre-paid gift cards or other financial products. If you identify a suspicious transaction, follow the Company's procedures for handling the transaction and reporting the suspicious activity. By staying vigilant, we can prevent transactions that support terrorism, drug trafficking, consumer fraud, and other criminal conduct.

## **Follow International Trade and Sanctions Rules**

We are committed to following trade compliance and sanctions laws. Economic sanctions prohibit or restrict dealings with certain countries and territories, governments, entities, and individuals to further national security and foreign policy goals. If you are involved in the transfer of goods or services across national borders on behalf of the Company, follow applicable Company procedures to comply with all trade laws and to ensure that you are not doing business with a sanctioned jurisdiction or person. Consult with Legal if you have any questions about the applicability of these requirements.



## Keep Accurate Records

We are committed to the integrity of Company records. We may face serious penalties or consequences if we don't keep accurate records of financial transactions and Company information. Even if you are not directly responsible for preparing financial disclosures, you are responsible for following our Finance and Accounting policies and reporting accurate information in the business records you prepare or manage.



### EXAMPLE



**“A coworker told me she delayed entering vendor invoices from the current reporting period to the next reporting period to help ‘our numbers.’ Is this a problem?”**



Yes. Purposefully delaying the entry of invoices is dishonest and could lead to serious consequences for the Company and responsible coworker. Report this conduct to Legal, Ethics and Compliance, or Integrity Matters.



## Protect the Company's Physical Assets and Property

We are all stewards of the Company's property, reputation, and resources. This means we have an obligation to take care of the Company's property and protect it from loss, theft, misuse, waste, and damage. Such incidents directly impact our ability to serve customers and communities and to provide an excellent shopping and working environment and experience.

Although we are responsible for protecting Company property, associates must comply with Company guidelines regarding suspected shoplifters and remember that the safety of associates and customers is always our top priority.

In general, we should use Family Dollar property, such as Company cars, buildings, and equipment, for only business purposes in accordance with our guidelines and policies. Limited personal use of Company property may be permitted under certain guidelines and policies, but such personal use must not interfere with our professional responsibilities.

For all concerns or questions regarding the use or protection of the Company's physical property or assets, contact Asset Protection or Integrity Matters.



### EXAMPLES



**“A customer returned a toy with a small manufacturing defect. Since I know we can't sell it, may I take it and give it to my daughter?”**



No. Even defective, expired, or otherwise compromised merchandise is still the property of the Company and must be properly accounted for and processed through the established returns process.



**“As I was getting ready to leave work, I noticed that a fellow associate has several Family Dollar products in her personal bag. I don't know if she paid for them, and I don't want her to get in trouble since I'm sure she doesn't mean any harm. What should I do?”**



Stealing from the Company is a serious offense, and it hurts all of us. You should let your manager or Asset Protection know about your concern right away so that it can be dealt with appropriately. You can also report suspected associate theft through Integrity Matters.

## Handle Data with Care

We are committed to handling and protecting confidential information, proprietary information, and intellectual property generated or gathered in our business with care. We also respect others' confidential information and intellectual property rights.

We protect ourselves, our customers, and our vendors by storing records and documents in secure, appropriate locations where only authorized associates can access them. Unauthorized use or distribution of confidential information, proprietary information, or intellectual property could result in serious negative consequences for the Company and any associates involved, including potential legal and disciplinary actions. This means that confidential information, proprietary information, and intellectual property must never be stored on personal computers or devices.

Your obligation to protect Company information continues even after you leave the Company. When you leave, you must return all confidential information, proprietary information, and intellectual property in your possession, whether in physical or digital form. Keep in mind that what you develop while employed by the Company may belong to the Company, and you may not use it for your own benefit or share it with another entity. Contact Legal, Ethics and Compliance, or Integrity Matters for questions.



## Protect Personal Information

We are committed to protecting personal information, respecting individuals' data privacy rights, and complying with all applicable data privacy laws. Associates must be careful to collect sensitive personal information only when necessary. When collecting such information, associates should explain clearly what is being collected, what it will be used for, and whether such collection is optional. Applicable law may require further disclosures at or before the point of data collection, so associates should follow all Company policies and procedures applicable to data collection. The information should be maintained for no longer than necessary.

Associates must use only authorized applications for collecting, sharing, storing, or otherwise processing personal information, and never store that information on personal computers or devices. Do not disclose personal information to any third party, unless the third party has signed an appropriate agreement with the Company and the sharing is occurring pursuant to that agreement. Contact Legal for questions.



### EXAMPLE



**"I accidentally sent an email containing customer or associate information to the wrong person. What should I do?"**



Incidents where customer or personal information is sent to an unauthorized person must be immediately reported to Legal, Ethics and Compliance, or Integrity Matters.



# Integrity for Our Communities



## INTEGRITY FOR OUR COMMUNITIES

### Moving Toward a More Sustainable and Environmentally Responsible Future

We are committed to complying with all environmental laws and regulations, and we strive to conduct our business in a sustainable and environmentally responsible manner. If you suspect that regulated or hazardous materials are being handled or disposed of in an unsafe or unlawful way, contact the Environmental, Health and Safety team or Integrity Matters.



#### EXAMPLE



**“I recently noticed associates on my team discarding batteries improperly. I don’t think it’s hurting anyone since it seems to have just happened once. Should I say something?”**



Yes. Disposing of certain chemicals and other hazardous materials improperly may violate environmental and health laws and potentially harm the communities in which we operate. Tell your manager immediately if you observe such practices. You can also reach out to the Environmental, Health and Safety team or Integrity Matters if you have any questions or concerns.

### Charitable Giving

The Company encourages associates to make a difference in their communities and engage in charitable activities on their own time, in their own names, and at their own expense. No associates can or should imply that donations of any kind are endorsed or sponsored by the Company unless the donation has been approved by the Ethics and Compliance Department.



## Political Activities

The Company does not misuse its corporate standing to influence political issues, nor do we become involved in unethical political activities.

Associates may give personal time, money, or resources to political activities or seek public office so long as that decision is voluntary and the related activities do not interfere with the associate's employment. Associates may not speak for the Company on political matters and may not coerce or pressure other associates to make political contributions or otherwise engage in political activities.



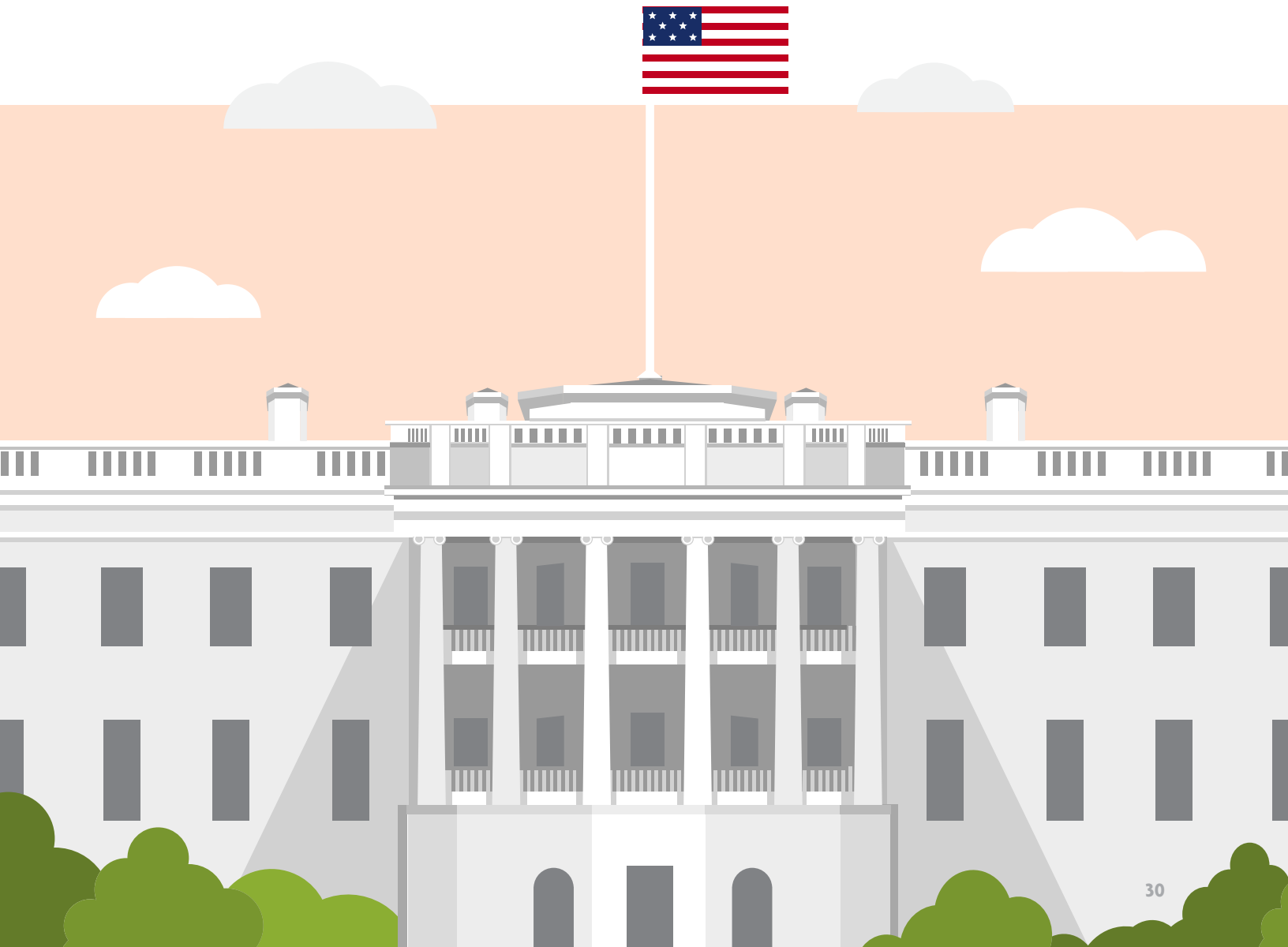
### EXAMPLE



**“I am a distribution center general manager who is very active in local politics, and I support a great candidate for local office. I've been wearing his campaign button outside of working hours, and I'd like to encourage associates who work in the distribution center to also wear his campaign buttons. Can I ask them to do so?”**



No. You may not use your leadership position to encourage or pressure other associates to support a candidate for office or any other political cause, even outside of working hours.



## Media Communications

We can protect our reputation and credibility by ensuring that official messages and public statements about the Company are channeled exclusively through our Communications team. Only authorized associates who have been designated as Company spokespeople may speak for the Company to any media outlet, on a social media platform, or in a public forum.

If you receive media inquiries or similar requests for information or have any questions about public-facing messages or the Company's business activities or public policy positions, direct them to the Communications team.



### EXAMPLE



**“My neighbor recently shared a negative story about Family Dollar through her social media. I think she’s mistaken and misrepresenting her experience. Is it okay for me to go online and correct her story, as a Family Dollar associate?”**



No. Do not engage publicly in the social media discussion unless you are authorized to speak on Family Dollar's behalf. Your response could be misinterpreted, and you may be misunderstood as speaking for Family Dollar as a whole. Notify the Communications team if you think that there is something Family Dollar can do to address your neighbor's complaint or correct her misunderstanding.



## REPORTING AND NON-RETALIATION

Family Dollar prohibits retaliation against any Associate or vendor employee who, in good faith, reports an actual or suspected violation of this Code of Conduct.



### WAYS TO REPORT TO INTEGRITY MATTERS OR ETHICS AND COMPLIANCE

**Concerns about any violations of this Code of Conduct, including any ethical issues, bribery, corruption, or violations of laws, should be reported using:**



#### **Integrity Matters Hotline**

In the US call 1-833-777-7587;  
in China call 400-120-1892



#### **Integrity Matters Email**

[FDIntegrityMatters@familydollar.com](mailto:FDIntegrityMatters@familydollar.com)



#### **Integrity Matters Website**

[IntegrityMattersFamilyDollar.Ethicspoint.com](http://IntegrityMattersFamilyDollar.Ethicspoint.com)



#### **Ethics and Compliance**

[FDEthicsAndCompliance@familydollar.com](mailto:FDEthicsAndCompliance@familydollar.com)

